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8 **UNITED STATES DISTRICT COURT**
9 **CENTRAL DISTRICT OF CALIFORNIA**
10 **EASTERN DIVISION**

11 SIGMA BETA XI, INC.; ANDREW
M., by and through his next friend
12 DENISE M., on behalf of himself and
all others similarly situated; JACOB
13 T., by and through his next friend
HEATHER T., on behalf of himself
14 and all others similarly situated; J.F.,
by and through her next friend CINDY
15 MCCONNELL, on behalf of herself
and all others similarly situated,

16 Plaintiffs,

17 v.

18 COUNTY OF RIVERSIDE; MARK
HAKE, Chief of the Riverside County
19 Probation Department, in his official
capacity; BRYCE HULSTROM, Chief
20 Deputy of the Riverside County
Probation Department, in his official
21 capacity,

22 Defendants.
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Case No. 5:18-cv-01399-JGB-JEM

CLASS ACTION

**DECLARATION OF KELLY MORAN
IN SUPPORT OF SUMMARY OF
OBJECTIONS OR RESPONSES TO
CLASS SETTLEMENT RECEIVED
FROM CLASS MEMBERS**

*[Filed Concurrently with Motion for
Final Approval of Class Settlement,
Summary of Objections or Responses to
Class Settlement, Declaration of Sylvia
Torres-Guillén, Declaration of Linnea
Nelson and Proposed Order]*

Complaint Filed: July 1, 2018
Vacated Trial Date: Nov. 19, 2019

Judge: Hon. Jesus G. Bernal
Mag. Judge: John E. McDermott

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Attorneys for Plaintiffs

DECLARATION OF KELLY A. MORAN

I, KELLY A. MORAN, declare and state as follows:

1. I am an attorney duly licensed to practice law before this court and am a Deputy County Counsel with the Office of County Counsel for the County of Riverside, attorneys of record for Defendants County of Riverside; Mark Hake, and Bryce Hulstrom (hereinafter collectively the “County”).

2. The facts contained in this declaration are known personally to me and if called upon to testify as a witness thereto, I could and would competently do so under oath. This declaration is submitted in support of Plaintiffs’ Unopposed Motion for Final Approval of Class Action Settlement (“Motion for Final Approval”) and Plaintiffs’ Summary of Objections or Responses to Class Settlement Received From Class Members (“Summary of Responses to Class Settlement”).

3. Pursuant to the terms of the Class Settlement Agreement (“Agreement”), effective July 1, 2019, the Riverside County Probation Department (“Probation”) has terminated the Youth Accountability Team (“YAT”) program for any youth referred to the program under Welfare & Institutions Code Section 601. Any youth whose participation in the YAT program was concluded on July 1, 2019 were promptly notified of this termination.

4. The notices to the class (“Notice”) and a copy of the Agreement were posted online by the County and Probation on a rolling basis as finalized versions were agreed upon by counsel and made available to the County. By October 17, 2019, all Notices and a copy of the Agreement were posted online in both English and Spanish on the following County websites: <https://probation.co.riverside.ca.us/> and <https://www.countyofriverside.us/>.

5. On December 19, 2019, this Court continued the deadline for notice to the class to be completed and continued the hearing on final approval of the class settlement. On January 10, 2020, an updated Notice (“Updated Notice”) to the Class

1 Members was posted on the County websites, in both English and Spanish, informing
2 the Class Members of the new hearing date.

3 6. I regularly check the County of Riverside and Probation Department
4 websites to ensure that the Notices and Agreement remain posted and available.

5 7. On September 24, 2019, the County posted the Notice, in English and
6 Spanish, in the following locations where Riverside County YAT probation officers
7 are regularly stationed: Banning Office; Iowa Office; Main Street Office; Juvenile
8 Services Division Office; Corona Office; Murrieta/Technology Office; Moreno
9 Valley Office; San Jacinto Office; Research Park Office; Palm Springs Office; Indio
10 Office; and Blythe Office. On January 8, 2020, the Updated Notice was posted in the
11 aforementioned offices.

12 8. The web postings and postings in locations where YAT probation
13 officers are regularly stationed will remain in place until this Court issues an order
14 approving or rejecting the Settlement, and will then remain posted in compliance with
15 the terms of the Settlement Agreement.

16 9. On September 24, 2019, the County provided the Notice, in English and
17 Spanish, to juvenile defense attorneys in Riverside County through the Riverside
18 County Public Defender and alternate public defender offices. On January 8, 2020,
19 the Updated Notices were also provided to the aforementioned juvenile defense
20 attorneys.

21 10. The County contracted with AB Data to send postcard notices to all class
22 members.

23 11. On January 3, 2020, AB Data sent postcard notices in English to all
24 potential class members, which included 39,319 individuals. All 39,319 individuals
25 were also later sent postcard notices in Spanish on January 17, 2020.

26 12. On September 13, 2019, AB Data created a number for interested parties
27 to call to find out if they were a member of the class (877-318-6163). As of March 4,
28 2020, AB Data received 23 calls on this line.

1 13. Neither my office nor Probation have received any objection from Class
2 Members to the settlement, either by regular mail or email.

3 I declare under penalty of perjury that the foregoing is true and correct.

4 Executed on March 9, 2020 in Riverside, California.

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6 By  _____

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8 Kelly A. Moran

9 Deputy County Counsel
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